1	EDMUND G. BROWN JR. Attorney General of California	
2	GREGORY J. SALUTE Supervising Deputy Attorney General	
3	ALVARO MEJIA,	
4	Deputy Attorney General State Bar No. 206911	
5	300 So. Spring Street, Suite 1702 Los Angeles, CA 90013	
6	Telephone: (213) 897-0083 Facsimile: (213) 897-2804	
7	Attorneys for Complainant	
8	BEFORE THE	
9	BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS	
10	STATE OF CALIFORNIA	
11	In the Matter of the Accusation Against:	Case No. 2010 -85
12	GUIXUAN MOU	ACCUSATION
13	aka GUI XUAN MOU 1600 S. Baldwin Ave., Apt. 27	
14	Arcadia, CA 91007	
15	Registered Nurse License No. 723346	
16	Respondent. '	
17		
18	Complainant alleges:	
19	<u>PARTIES</u>	
20	1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation	
21	solely in her official capacity as the Interim Executive Officer of the Board of Registered	
22	Nursing ("Board"), Department of Consumer Affairs.	
	Nursing ("Board"), Department of Consumer Affair	s.
23		s. the Board issued Registered Nurse License
23 24		the Board issued Registered Nurse License
	2. On or about March 24, 2008,	the Board issued Registered Nurse License Respondent"). The Registered Nurse
24	2. On or about March 24, 2008, No. 723346 to Guixuan Mou, aka Gui Xuan Mou ("	the Board issued Registered Nurse License Respondent"). The Registered Nurse
24 25	2. On or about March 24, 2008, No. 723346 to Guixuan Mou, aka Gui Xuan Mou (" License was in full force and effect at all times relev	the Board issued Registered Nurse License Respondent"). The Registered Nurse
242526	2. On or about March 24, 2008, No. 723346 to Guixuan Mou, aka Gui Xuan Mou (" License was in full force and effect at all times releven expire on August 31, 2011, unless renewed.	the Board issued Registered Nurse License Respondent"). The Registered Nurse

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JURISDICTION

3. This Accusation is brought before the Board, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

STATUTORY PROVISIONS

- 4. Section 2750 of the Business and Professions Code ("Code") provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.
- 5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811, subdivision (b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.
 - 6. Section 2761 of the Code states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

- "(a) Unprofessional conduct, which includes, but is not limited to, the following:
-
- "(b) Procuring his or her certificate or license by fraud, misrepresentation, or mistake.
 -
- "(e) Making or giving any false statement or information in connection with the application for issuance of a certificate or license."

COST RECOVERY

7. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

FIRST CAUSE FOR DISCIPLINE

(Procuring a Certificate or License by Fraud or Misrepresentation)

8. Respondent is subject to disciplinary action under Code section 2761, subdivision (b), in that she submitted a graduation certificate and college transcripts to the Board representing that she had obtained her nursing diploma from Bengbu Medical College, School of Nursing. In fact, the graduation certificate and transcripts were fraudulently prepared and Respondent never attended Bengbu Medical College, School of Nursing.

SECOND CAUSE FOR DISCIPLINE

(Unprofessional Conduct - False Statements)

9. Respondent is subject to disciplinary action under Code section 2761, subdivision (e), in that she represented to the Board that she had obtained her nursing diploma from Bengbu Medical College, School of Nursing, when in fact, she had not, as further described in paragraph 8.

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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board issue a decision:

- Revoking or suspending Registered Nurse License No. 723346, issued to Guixuan Mou, aka Gui Xuan Mou.
- 2. Ordering Guixuan Mou, aka Gui Xuan Mou, to pay the Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3.
 - 3. Taking such other and further action as deemed necessary and proper.

DATED: 8/18/2009

LOUISE R. BAILEY, M.ED., RN

Interim Executive Officer Board of Registered Nursing

State of California Complainant

DOJ Matter ID: LA2009603351 60448634.wpd

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1	EDMUND G. BROWN JR.		
2	Attorney General of California GREGORY J. SALUTE		
3	Supervising Deputy Attorney General ALVARO MEJIA		
4	Deputy Attorney General State Bar No. 216956		
5	300 So. Spring Street, Suite 1702 Los Angeles, CA 90013		
6	Telephone: (213) 897-0083 Facsimile: (213) 897-2804		
7	Attorneys for Complainant		
8		RE THE	
9	DEPARTMENT OF CONSUMER AFFAIRS		
	STATE OF C	CALIFORNIA	
10	In the Matter of the Interim Suspension Order	Case No. 2000 - 85	
11	Against:		
12	GUIXUAN MOU aka GUI XUAN MOU	STIPULATED INTERIM	
13	1600 S. Baldwin Ave., Apt. 28 Arcadia, CA 91007	SUSPENSION OF LICENSE	
14	Registered Nurse License No. 723346		
15	Respondent.		
16	respondent.		
17			
18	IT IS HEREBY STIPULATED AND AGREED by and between the parties in this		
19	proceeding that the following matters are true:		
20	<u>PARTIES</u>		
21	1. Heidi J. Goodman ("Complainant") is the Assistant Executive Officer of the Board of		
22	Registered Nursing. She brought this action solely in her official capacity and is represented in		
23	this matter by Edmund G. Brown Jr., Attorney General of the State of California, by Alvaro		
24	Mejia, Deputy Attorney General.		
25	2. Guixuan Mou, aka Gui Xuan Mon ("I	Respondent") is represented in this proceeding	
26		· · · · · · · · · · · · · · · · · · ·	
27	by attorney Joseph Vincent Camarata, Esq., whose address is 3303 Del Mar Avenue, Suite B, Rosemead, CA 91770.		
28	///		

3. On or about March 24, 2008, the Board of Registered Nursing issued Registered Nurse License No. 723346 to Guixuan Mou. The license was in full force and effect at all times relevant to the charges brought forth in the Petition for Interim Suspension Order and will expire on August 31, 2011, unless renewed.

JURISDICTION

4. The Petition for Interim Suspension Order against Guixuan Mou ("Petition") was filed before the Board, and is currently pending against Respondent.

ADVISEMENT AND WAIVERS

- 5. Respondent has carefully read, and understands the charges and allegations in the Petition. Respondent has also carefully read, and understands the effects of this Stipulated Interim Suspension of License.
- 6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Petition; the right to be represented by counsel at her own expense; the right to present affidavits, documentary evidence and oral argument at the hearing; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.
- 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

STIPULATION

IT IS HEREBY STIPULATED that Registered Nurse License Number 723346 issued to Guixuan Mou, aka Gui Xuan Mou, is temporarily suspended pending resolution of the administrative proceedings.

- 1. Respondent shall lose all rights and privileges as a registered nurse in California as of the date of this fully executed Stipulated Interim Suspension of License until the resolution of an Accusation to be filed before the Board against Respondent's license;
- 2. Respondent shall not be practice or attempt to practice any aspect of nursing in the State of California until the Board's decision following an administrative hearing becomes final;

- 3. Respondent shall not advertise, by any means, or hold herself out as practicing or available to practice nursing.
- 4. Respondent shall, within 48 hours of executing this Stipulated Interim Suspension of License, deliver to the Board, or its agent, for safekeeping pending a final administrative order of the Board in this matter, all indicia of her licensure as a registered nurse, including, but not limited to, her wall certificate and wallet card issued by the Board.
- 5. The parties understand and agree that facsimile copies of this Stipulated Interim Suspension of License, including facsimile signatures thereto, shall have the same force and effect as the originals.

IT IS SO STIPULATED

I have carefully read the Stipulated Interim Suspension of License. I understand the stipulation and the effect it will have on my Registered Nursing License. I enter into this voluntarily, knowingly, and intelligently, and agree to be bound by the conditions in this agreement.

DATED: 08/11/09 GUIXUAN MOU

I have read and fully discussed with Respondent Guixuan Mou the terms and conditions and other matters contained in this Stipulated Interim Suspension of License. I approve its form and content.

Respondent

DATED: 8/11/09

JOSEPH VINCENT CAMARATA, ES

JOSEPH VINCENT CAMARATA, ESC Attorney for Respondent

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1	IT IS SO STIPULATED
2	DATED: August 11, 2009
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4	EDMUND G. BROWN JR. Attorney General of California GREGORY J. SALUTE
5	GREGORY J. SALUTE Supervising Deputy Attorney General
6	
7	ALVARO MEJIA
8	Deputy Attorney General Attorneys for Complainant
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11	DOJ Matter ID: LA2009603351 60446180.doc
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